

**EXHIBIT 32**

**From:** "Louis M. Phillips" <Louis.Phillips@kellyhart.com>

**To:** "Tim Cournoyer" <TCournoyer@HighlandCapital.com>

**Cc:** "Amelia L. Hurt" <Amelia.Hurt@kellyhart.com>, "Jim Shields" <jshields@shieldslegal.com>, "John A. Morris" <jmorris@pszjlaw.com>, "Jeff Pomerantz" <jpomerantz@pszjlaw.com>

**Subject:** RE: SETTLEMENT AND RELEASE AGREEMENT KHH FINAL REDLINE COMMENTS 5.16.PDF; Highland HMIT-Rand Settlement Agreement.012(Highland Draft 05.15.25) KHH Clean for Execution 5.16.DOCX

**Date:** Fri, 16 May 2025 20:15:55 +0000

**Importance:** Normal

**Inline-Images:** image004.jpg; image001.png

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Everyone,

I am holding Mark's signatures.

**Louis M. Phillips**  
*Partner*



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**From:** Tim Cournoyer <TCournoyer@HighlandCapital.com>  
**Sent:** Friday, May 16, 2025 1:24 PM

HCMLPHMIT00000287

To: Louis M. Phillips <Louis.Phillips@kellyhart.com> Exhibit 32 Page 3 of 4

Cc: Amelia L. Hurt <Amelia.Hurt@kellyhart.com>; Jim Shields <jshields@shieldslegal.com>; John A. Morris <jmorris@pszlaw.com>; Jeff Pomerantz <jpomerantz@pszlaw.com>

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Louis,

Please find attached a revised draft with just two clean-up changes as reflected in the Redline.

We have received verbal approval of the Claimant Trust's Oversight Board to proceed, and we are in the process of collecting signatures to the written consents of the Class 9 holders and the Oversight Board, and our internal signatures to the Settlement Agreement. If you could begin to do the same on your end, we will confirm once we are ready to exchange signature pages.

Thanks and please let us know if you have any questions or concerns.

Best,

**TIMOTHY J. COURNOYER**  
MANAGING DIRECTOR AND ASSISTANT GENERAL COUNSEL



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**From:** Louis M. Phillips <[Louis.Phillips@kellyhart.com](mailto:Louis.Phillips@kellyhart.com)>

**Sent:** Friday, May 16, 2025 11:40 AM

**To:** John A. Morris <[jmorris@pszlaw.com](mailto:jmorris@pszlaw.com)>; Jeff Pomerantz <[jpomerantz@pszlaw.com](mailto:jpomerantz@pszlaw.com)>

**Cc:** Amelia L. Hurt <[Amelia.Hurt@kellyhart.com](mailto:Amelia.Hurt@kellyhart.com)>; Jim Shields <[jshields@shieldslegal.com](mailto:jshields@shieldslegal.com)>

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John and Jeff,

Please see a final redline with wire instructions added, a bold of a WHEREAS, and references to payments being made by Wire Transfer. I did not add the Wire Transfer to the final distribution part because of the reference to "assets" versus payment and did not want to go into the body of the document to deal with that. Also the attached PDF (redlined against John's clean from yesterday) does not include the header clean up contained in the word version. We are prepared to execute this version. Mark will be out for a while today so just let us know if we can get his signatures or whether you have any further comments. Thank you.

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